

Exhibit 1

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ERICA FRASCO, et al., individually and on
behalf of all others similarly situated,

Plaintiff,

v.

FLO HEALTH, INC., GOOGLE, LLC,
FACEBOOK, INC., APPSFLYER, INC., and
FLURRY, INC.,

Defendants.

Case No. 3:21-cv-00757-JD

**DECLARATION OF JUSTIN PARKS
OF A.B. DATA**

I, Justin Parks, declare as follows:

1. I am a Vice President with A.B. Data, Ltd. (“A.B. Data”). I am fully familiar with the facts contained herein based upon my personal knowledge, and if called as a witness, could and would testify competently thereto. I submit this Declaration at the request of the Parties in connection with the above-captioned action.

2. Previously, I submitted a declaration, *Declaration of Justin Parks of A.B. Data Regarding the Proposed Notice Plan and in Support of Plaintiffs’ Motion for Preliminary Approval of Class Settlement with Defendant Flurry LLC* (Dkt. No. 589-11), outlining my and A.B. Data’s credentials, including in recent data breach and consumer privacy matters, and provided an updated profile of A.B. Data’s background and capabilities in the declaration, *Declaration of Justin Parks of A.B. Data in Support of the Parties Joint Proposed Pretrial Class Notice Plan* (Dkt. No. 617).

3. A.B. Data has been acting as Notice Administrator in this case regarding the recently completed notification plan (“Notice Plan”). My previous declaration, *Declaration of Justin Parks of A.B. Data on Implementation of Notice Plan* (Dkt. 694-1) described the implementation of the Notice Plan and how it provided notice to the nationwide class and California subclass in this action.

1 4. This Declaration provides the Court with updated administration and exclusion
2 information. It is based upon my personal knowledge and upon information provided to me by my
3 associates, and A.B. Data staff members.

4 5. As of July 28, 2025, there have been 71 calls to the toll-free telephone number.

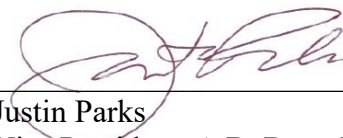
5 6. As of July 28, 2025, there have been 177,471 unique visitors to the website.

6 7. As of July 28, 2025, A.B. Data has received 33 emails.

7 8. The deadline for Class Members to request exclusion from the class (and subclass)
8 was July 20, 2025. As of July 28, 2025, A.B. Data has received 57 unique exclusion requests (60
9 online exclusions were received, of which three are duplicates). Of these exclusion requests, 55
10 exclusion requests were timely submitted, and 2 were submitted on July 21, 2025, as the online
11 exclusion page was in the process of being taken offline. Whereas the exclusion deadline was a
12 postmark deadline, timely exclusion requests sent by regular mail may be in the possession of the
13 United States Postal Service and not yet delivered to A.B. Data. A.B. Data has not received any
14 additional exclusion requests since its previous status report. Should A.B. Data receive any timely
15 mailed exclusions which are received after this declaration is filed, A.B. Data will submit a
16 supplemental declaration containing an updated list of exclusion requests.

17 I declare under penalty of perjury under the laws of the United States that the foregoing is
18 true and correct.

19 Executed this 28st day of July 2025 in Minneapolis, Minnesota.

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23 Justin Parks
24 Vice President, A.B. Data, Ltd.
25 Class Action Administration Division
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